

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Petition for Clarification of Hawk Relay)	CG Docket No. 08-15
Concerning the Provision of Deaf Blind Relay)	
Service (DBRS))	

Comments of the Registry of Interpreters for the Deaf, Inc. (RID)

The Registry of Interpreters for the Deaf, Inc. (“RID”)¹ hereby submits its comments in response to the Commission’s Public Notice in the above-captioned proceeding² regarding a petition for clarification filed by Hawk Relay (“Hawk Relay”).³ RID is in support of the intent behind this petition and supports the concept of a DBRS as an option to improve the telecommunications access of Deaf Blind individuals. DBRS could fall under the definition of TRS as set forth in section 225(a)(3) of the Communications Act of 1934.

¹ RID has played a leading role in establishing a national standard of quality for interpreters and transliterators. We encourage the growth of the profession, educate the public about the vital role of interpreters and transliterators and work to ensure equal opportunity and access for all individuals. The philosophy of RID is that excellence in the delivery of interpretation and transliteration services between people who are deaf or hard of hearing and people who are hearing, will ensure effective communication.

² See *Consumer & Governmental Affairs Bureau Seeks Comments on Petition for Clarification Concerning the Provision of Deaf Blind Relay Service (DBRS)*, CG Docket No. 03-123, Public Notice, DA 07-4924 (rel. Dec. 7, 2007) (“Public Notice”).

³ See Petition of Hawk Relay for Clarification of Deaf-Blind Relay Services, CG Docket No. 03-123 (filed May 18, 2007) (“Hawk Petition”).

DBRS could provide functional equivalency and equal access to telecommunications for persons who are Deaf Blind. It should be noted that the FCC regulations and the Americans with Disabilities Act stipulate that signed language interpreters be “qualified” to interpret in the specific settings in which they are employed. To preserve the integrity and quality of TRS services, RID recommends that the proposed Communication Facilitators (CFs) be recognized and deemed as qualified by a regulating body. One example, but not the sole possible example, of a qualified individual would be a Certified Deaf Interpreter (CDI; recognized and evaluated by RID) who is trained to serve as a DBRS CF. There are other possibilities for recognizing and qualifying CFs to provide DBRS that would be reimbursable by the TRS fund. Further discussion on this topic is supported by RID, in partnership with other interested stakeholders.

Additionally, the specific format and physical arrangements for providing CFs also beg further exploration before DBRS could be provided on a wide scale basis, and before it could be regulated by the FCC. This is a large undertaking for providing services to a previously under-served population.

RID recognizes and supports the efforts of the organizations which are requesting DBRS to improve telecommunications access for Deaf Blind individuals, and for these services to be reimbursed from the TRS fund.

However, the qualifications and specifications of providing said service requires further discussion. To this end, RID would welcome a Summit as an avenue for continued investigation into the minimal and optimal conditions for providing DBRS.

Respectfully submitted,

Cheryl Moose

RID President